

ESTTA Tracking number: **ESTTA667290**

Filing date: **04/17/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92056611
Party	Plaintiff Evergreen Media Holdings, LLC
Correspondence Address	MICHAEL R PATRICK PATRICK LLC ONE ATLANTIC STREET , SUITE 604 STAMFORD, TX 97355 UNITED STATES michael@pllclaw.com, tonydg@evergreenmediagroup.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Michael R. Patrick
Filer's e-mail	michael@pllclaw.com
Signature	/Michael R. Patrick/
Date	04/17/2015
Attachments	Motion for Extension of Time on Consent (4-17-2015).pdf(19431 bytes)

EVERGREEN MEDIA
HOLDINGS LLC,

Plaintiff,

v.

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendant.

Evergreen Media Holdings, LLC (“Plaintiff”) hereby requests an extension of time, namely of thirty (30) days, as to all current deadlines. This Motion is for good cause, namely: (i) the parties require additional time to conduct discovery, among other things, due to, in part, continuing family matters requiring the undersigned’s time and attention for the past several months and which has required and will require several critical appearances in State Court in Connecticut and meetings with medical professionals concerning Plaintiff’s counsel’s oldest son; and (ii) the parties are engaged in settlement discussions.

1. Plaintiff's counsel, Michael R. Patrick, has been involved in an urgent and sensitive personal medical matter involving his family for the past month that continues to require his time and attention, resulting in several past and upcoming appearances in the State Court in Connecticut, as well as meetings with medical professionals regarding his son. Accordingly, an extension of all deadlines is warranted.

2. The parties also request additional time insofar as settlement discussions continue between the parties. Recently, those discussions have resulted in an exchange of communications. However, unavoidable travel schedules of the parties (combined with Mr. Patrick's urgent family matters) has slightly delayed the parties' ability to definitively determine whether the latest communications will result in a settlement.

3. Accordingly, the parties request an extension of thirty (30) days as to all remaining deadlines and that the trial dates be reset as follows:

Initial Disclosures Due	COMPLETED
Expert Disclosures Due	4/20/2015
Discovery Closes	5/20/2015
Plaintiff's Pretrial Disclosures	7/4/2015
Plaintiff's 30-day Trial Period Ends	8/18/2015
Defendant's Pretrial Disclosures	9/2/2015
Defendant's 30-day Trial Period Ends	10/17/2015
Plaintiff's Rebuttal Disclosures	9/1/2015
Plaintiff's 15-day Rebuttal Period Ends	12/1/2015

4. The undersigned has conferred with counsel for Defendant, Christopher Verdini, who consents to the relief requested herein.

WHEREFORE, Plaintiff requests that this Motion be granted.

Dated: April 17, 2015

RESPECTFULLY SUBMITTED,

/s/ Michael R. Patrick

PATRICK LLC

One Atlantic Street, Suite 604

Stamford, Connecticut 06901

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Attorney for

Evergreen Media Holdings, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address of record by facsimile or email (by agreement) on this date, April 17, 2015.

/s/ Michael R. Patrick

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Evergreen Media Holdings, LLC